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Berger, Fischoff, Shumer, Wexler & Goodman, LLP Proposed Attorneys for the Debtor & Debtor-in-Possession Heath S. Berger, Esq. Gary C. Fischoff, Esq. 6901 Jericho Turnpike, Suite 230 Syosset, New York 11791 (516) 747-1136

COUNTY OF PALM BEACH)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORKX	
In re:	Chapter 11
RUDOLPH W. GIULIANI a/k/a RUDOLPH WILLIAM GIULIANI	Case No.: 23-12055
	"Lar Dan"
Debtor.	<u>Affidavit</u>
X	
STATE OF FLORIDA)ss;	

I, James Menges, hereby declare pursuant to 28 U.S.C. §1746 that the following statements are true and correct to the best of my knowledge and belief after due inquiry as detailed herein:

I am the Trustee of the Giuliani Freedom Fund Legal Defense T.R. Fund "Giuliani Freedom Fund". From the period May 13, 2022 through January 16, 2024 the Giuliani Freedom Fund Legal Defense T.R. Fund has paid to the Law Firm of Camara & Sibley, LLP \$288,035.15 towards legal fees incurred by Camara & Sibley, LLP. The fees were paid in connection with the Firm's representation of the Debtor in connection with Case No: 1:21-cv-03354-BAH Freeman et al v. Giuliani pending in the United States District of Columbia. Guiliani Freedom Fund waives any and all reimbursement and/or indemnification of the \$288,035.15 of the legal fees paid

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- 2. I understand that the law firm of Camara & Sibley, LLP (the "Firm") has been ed to represent the Debtor. I also understand that the Firm's obligation is solely for the sentation of the Debtor to the exclusion of any other entity or individual, including the lani Freedom Fund.
- 3. Giuliani Freedom Fund is not a creditor of the Debtor. Other than assisting the stor with payments of legal fees to the Camara & Sibley, LLP firm and other firms, the liani Freedom Fund has no relationship with the Debtor.
- 4. Giuliani Freedom Fund does not intend to bid on any assets of the Debtor and does intend to provide any financing to the Debtor beyond the payment of legal fees to Camara & ibley, LLP or on any other retained professionals whose retention on similar terms has been or ill be approved.

James Menges

Sworn to before me this 24 day of January, 2024

Notary Public

MAURICE PRINGLE
Notary Public - State of Florida
Commission # HH 175002
My Comm. Expires Sep. 12, 2025
Bonded through National Notary Assn.